

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON INC. PELVIC REPAIR	)	MDL Docket No. 2327
SYSTEM PRODUCTS LIABILITY	)	HONORABLE JUDGE JOSEPH R.
LITIGATION	)	GOODWIN

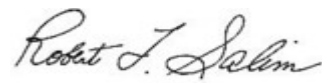
**UNOPPOSED MOTION FOR APPOINTING RONALD E. CORKERN, JR. AND LYNN  
BAKER AS SPECIAL MASTERS FOR PRIVATE SETTLEMENT AGREEMENT  
BETWEEN ETHICON AND CERTAIN PLAINTIFFS' COUNSEL**

Salim-Beasley, LLC and Anapol Weiss, as counsel for certain plaintiffs in this MDL 2327, hereby move the Court for entry of an Order to appoint Ronald E. Corkern, Jr. and Lynn Baker as Special Masters to perform certain defined functions related to the administration and implementation of the Confidential Master Settlement Agreement as agreed by Plaintiffs' Counsel and Ethicon. Specifically as agreed by the parties, Ronald E. Corkern, Jr. and Lynn Baker, as the Special Masters for the administration of the confidential settlement, will perform certain duties of the Special Master, in furtherance of the fair and efficient administration and implementation of the settlements. This Motion also seeks permission for the Special Masters to have *ex parte* communications with the parties to the Settlement Agreement, i.e., Plaintiffs' Counsel and their clients, Ethicon and its counsel, or the Court, and such *ex parte* communications shall not be deemed to have waived any attorney-client privileges.

For reasons stated above, Salim-Beasley, LLC and Anapol Weiss respectfully request that the Court appoint Ronald E. Corkern, Jr. and Lynn Baker as Special Masters for the private settlement agreement between Salim-Beasley, LLC, Anapol Weiss, and Ethicon and enter an Order in the form submitted herewith.

DATED: June 15, 2018

SALIM-BEASLEY, LLC



Robert L. Salim, LA #11663  
Lisa Causey-Streete, LA # 33767  
1901 Texas Street  
Natchitoches, LA 71457  
Phone: (318) 354-1818  
Fax: (318) 354-1227  
[robertsalim@cp-tel.net](mailto:robertsalim@cp-tel.net)  
[lcausey@salim-beasley.com](mailto:lcausey@salim-beasley.com)

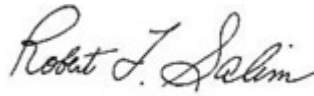
ANAPOL WEISS  
Attorneys for Plaintiffs



Thomas R. Anapol, Esq.  
One Logan Square Suite 1600  
130 N. 18<sup>th</sup> Street  
Philadelphia, PA 19103  
Tel #: (215) 790-4572  
Fax #: (856) 875-7707

**CERTIFICATE OF SERVICE**

I hereby certify that on June 15, 2018 a true and correct copy of the foregoing document has been filed electronically and is available for viewing and downloading from ECF system, which will send notification of such filing to the CM/ECF participants registered to receive service in the MDL.

A handwritten signature in cursive script, reading "Robert L. Salim".

---

Robert L. Salim